

Judge Lauren King

**IN THE DISTRICT COURT OF THE UNITED STATES OF AMERICA  
IN THE WESTERN DISTRICT OF WASHINGTON**

**NATHAN JOVEE,**

Plaintiff,

vs.

**MEERA SHIN et al.,**

Defendants.

**Case No.: 2:22-cv-00168-LK****FIRST MOTION TO AMEND COMPLAINT  
AND REMAND BACK TO STATE COURT****Noted for April 1st, 2022**

The plaintiff, Nathan Jovee, pro se, moves the Court pursuant to FRCP 15(a) to amend his complaint against the Defendants.

FRCP 15(a) states that for the complaint to be amended, the plaintiff must obtain leave of court and leave shall be granted when justice requires.

The plaintiff seeks to have the complaint amended to remove the Americans with Disabilities Act (ADA) claim (Ex. B, ¶ 16, Ln. 20) and remand this back to state court for further adjudication of plaintiff's state claims; as no further federal causes of action would grant this court jurisdiction in plaintiff's first amended complaint.

**DATED** this 17th day of March, 2022 at Everett, Washington.

//S// Nathan Jovee

Nathan Jovee, Pro Se litigant  
Honorably Discharged Disabled  
Iraqi War Veteran

**DECLARATION**

Undersigned states and declares as follows:

This particular motion resulted from plaintiff inadvertently leaving the ADA in his state complaint. Plaintiff does not and did not intend to litigate this ADA claim.

The proposed first amended complaint is attached as Exhibit A, outlining the removal of the “three words”; ADA. Exhibit B shows where plaintiff inadvertently left the ADA in his complaint at ¶ 16, Ln. 20. No other federal claims exist giving this court jurisdiction to adjudicate the further claims in plaintiffs amended complaint.

DATED this 17th day of March 2022 at Everett, Washington.

//S// Nathan Jovee

Nathan Jovee, Pro Se litigant  
Honorably Discharged Disabled  
Iraqi War Veteran

# Exhibit A

Judge Lauren King

**IN THE DISTRICT COURT OF THE UNITED STATES OF AMERICA  
IN THE WESTERN DISTRICT OF WASHINGTON**

<b>NATHAN JOVEE,</b> Plaintiff,  vs.  <b>MEERA SHIN as a County of Snohomish contracted Guardian Ad Litem, COUNTY OF SNOHOMISH as a sub-division of the State of Washington, COUNTY OF SNOHOMISH SHERIFF, DEPUTY SHERIFF JIM SIMONESCHI as a County of Snohomish Deputy Sheriff, L.M.E., INC, as a Legal Services Provider for the County of Snohomish and DOES 1 - 50,</b> Defendants.	<b>Case No.: 2:22-cv-00168-LK</b>  <b>[PROPOSED] PLAINTIFF'S 1ST AMENDED COMPLAINT FOR DAMAGES FOR:</b>  <b>(1) Negligence;</b> <b>(2) Intentional Infliction of Emotional Distress;</b> <b>and</b> <b>(3) The Washington State Consumer Protection Act.</b>  <b>JURY TRIAL DEMANDED</b>
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COMES NOW, plaintiff Nathan Jovee, a pro se indigent litigant who alleges as follows:

**General Allegations**

1. Plaintiff:

At all times relevant to this Complaint, N. Jovee was and is currently a resident of the County of Snohomish, located in Washington State; 425-530-7435; [njovee@gmail.com](mailto:njovee@gmail.com).

2. Defendants:



**Defendant No. 1**

At all times applicable herein, the County of Snohomish was and is a public entity of the State of Washington.

**Defendant No. 2**

N. Jovee asserts, on information and belief, at all times herein the County of Snohomish Sheriff and County of Snohomish Sheriff's Department are independently elected sub-divisions of the County of Snohomish and the State of Washington. Defendant County of Snohomish is vicariously liable for the actions of Defendants County of Snohomish Sheriff/Department under *respondeat superior* and other principles of agency law, such as, but not limited to, master-servant.

**Defendant No. 3**

N. Jovee asserts, on information and belief, at all times herein Defendant County of Snohomish Deputy Sheriff Jim Simoneschi is a resident of the County of Snohomish and is employed by the County of Snohomish Sheriff and/or the County of Snohomish and was within the course and scope of his employment as Deputy Sheriff. Defendant County of Snohomish and/or County of Snohomish Sheriff is vicariously liable for the actions of Defendant Jim Simoneschi under *respondeat superior* and other principles of agency law, such as, but not limited to, master-servant.

**Defendant No. 4**

N. Jovee asserts, on information and belief, at all times herein Defendant Guardian Ad Litem (GAL) Doctor Meera Shin is a resident of the County of King and is or was contracted and/or employed by the County of Snohomish and was within the course and scope of her employment and/or contract as a County of Snohomish GAL. Defendants County of Snohomish and/or L.M.E., INC, as a “business entity”, is vicariously liable for the actions of Defendant GAL Dr. Meera Shin under *respondeat superior* and other principles of agency law, such as, but not limited to, master-servant.

**Defendant No. 5**

N. Jovee asserts, on information and belief, at all times herein Defendant L.M.E., INC, the Registered and Governing Agent Lisa Micheli as Attorney at Law is an Active Business entity located in Everett, WA, 98203 in the County of Snohomish and was and/or is contracted with the County of Snohomish and was within the course and scope of her contract for Legal Services for the County of Snohomish. Defendant County of Snohomish and/or L.M.E., INC, as a “business entity”, is vicariously liable for the actions of Defendant/s L.M.E., INC and GAL Dr. Meera Shin; under *respondeat superior* and other principles of agency law, such as, but not limited to, master-servant.

**Defendant No. 6**

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4 N. Jovee is ignorant of the true names and capacities of those Defendants sued herein as  
5 DOES 1 through 50, and for that reason has sued such Defendants under such fictitious names.  
6 N. Jovee reserves his Rights, and will seek leave of Court to Amend this Complaint to identify  
7 said Defendants when their identities have been ascertained. N. Jovee is informed each of the  
8 factitiously named Defendants was in some manner liable and legally responsible, in that their  
9 conduct caused damages and injuries set forth herein.  
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- 11 3. N. Jovee claims this case involves Defendant County of Snohomish; allowing the Skagit  
12 County Superior Court to assume Jurisdiction and assert this is the proper Venue as  
13 prescribed under **RCW 36.01.050(1)**.  
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15 4. A claim for damages was properly filed with Defendant County of Snohomish. More than  
16 sixty (60) days have elapsed without a response from any Defendant. Attached hereto as  
17 **Exhibit 1** is a true and correct copy of N. Jovee's claim for damages submitted to the  
18 County of Snohomish Auditor's Office/Risk Management.  
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### 20 **Background of Facts**

- 21 5. N. Jovee married Jolene Marie Matkins, herein J. Jovee on November 27th, 2006 in  
22 Everett, Washington while he was serving on Active Duty in the United States Armed  
23 Forces. The marriage produced three sons, LJ (10/2008), SJ (10/2011), and BJ (12/2014).  
24 All three children had a close relationship with each other and had an equally as strong  
25 bond with their father, N. Jovee, and Mother J. Jovee.  
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27 6. The Marriage ended when J. Jovee filed a Petition for Dissolution of Marriage on May  
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23rd, 2016. An Automatic Temporary Injunction was entered upon the Parties by the Bryan County District Court of Oklahoma preventing the parties from removing the minor children from the State of Oklahoma. During the pendency of the Jovee's Dissolution of Marriage proceedings in the State of Oklahoma, J. Jovee produced a fourth (4) child in June of 2018; before the Jovee's were Divorced. A Judgment of Dissolution was entered in September of 2018 (Reversed in part 2021). J. Jovee was found Guilty of Contempt of Court by the Bryan County District Court for the State of Oklahoma in September of 2018 for removing the three (3) minor children from the State of Oklahoma twelve (12) days after Petitioning the Bryan County District Court for the State of Oklahoma for a Dissolution of Marriage. This violated the Oklahoma Automatic injunction entered by the Court after Petitioning for Divorce.

7. On December 14th, 2016 J. Jovee began "forum shopping" in Washington State District Court, Evergreen Division in Monroe, WA, County of Snohomish by initiating Court proceedings without exercising "Emergency Jurisdiction" as prescribed in **RCW 26.27** the UCCJEA.
8. On December 14th, 2016 the Bryan County District Court of Oklahoma entered an Order for Child Support upon N. Jovee in accordance with **RCW 26.27** the UCCJEA and **RCW 26.21A** the UIFSA.
9. On December 27th, 2016 the County of Snohomish was made aware proceedings involving the three (3) said Minor Children involved in this case and both parents were currently under the Jurisdiction of the State of Oklahoma in accordance with **RCW 26.27** the

UCCJEA.

10. On or about December of 2017 N. Jovee moved from the State of Oklahoma to the State of Washington. The Bryan County District Court of Oklahoma maintained Jurisdiction over all parties under **RCW 26.27** the UCCJEA and/or the **RCW 26.21A** the UIFSA.

11. On September 27th, 2018 the Bryan County District Court of Oklahoma entered a Custody Determination in accordance with **RCW 26.27** the UCCJEA and declaring “Home State” over N. Jovee, J. Jovee, and their three (3) said minor children in accordance with **RCW 26.27** the UCCJEA. Oklahoma maintained Jurisdiction for purposes of “appeal” and in accordance with **RCW 26.27** the UCCJEA; confirmed by the Oklahoma State Supreme Court Mandate. N. Jovee hired Counsel, Ms. Julie Fulton located in Oklahoma City, to file an Appeal on behalf of N. Jovee. This Order was eventually Reversed in-Part and Remanded with Instruction; June 8th, 2021.

12. On October 26th, 2018 N. Jovee filed an appeal through Counsel Ms. Julie Fulton, located in Oklahoma City, with the Oklahoma Court of Appeals.

13. On August 21st, 2018 the minor children’s Father N. Jovee made a suspected child abuse report to the County of Snohomish Department of Children, Youth, and Family Services upon LJ reporting abuse. A Social Worker did not investigate the allegations due to this report being “screened out”.

14. On October 30th, 2018 an “anonymous” reporter from the Sultan Public Elementary School made a suspected child abuse report to the County of Snohomish Department of Children, Youth, and Family Services on Jolene for “physical abuse” upon the oldest minor child,



striking and leaving a “red mark” across the child’s face.

15. On January 10th, 2019 a GAL Complaint was submitted to the King County Superior Court GAL Committee against Defendant GAL Dr. Meera Shin; claiming HIPPA misconduct and fraud.

16. On February 16th, 2019 an incident occurred where J. Jovee, the mother of the three (3) said Minor Children in this case, attempted to “remove” the three (3) said Minor Children from the care and custody of N. Jovee, on N. Jovee’s Court Ordered visitation time. The said Minor Children were returned to the safety of N. Jovee by the Washington State City of Fife Police Department to finish said visitation time with Father as allotted under the Court Ordered Oklahoma Custody Determination.

17. On April 26th, 2019 N. Jovee made Defendant’s County of Snohomish and L.M.E., INC aware by filing a Declaration, that a Custody Determination was already in place by the Bryan County District Court of the State of Oklahoma; and in accordance with **RCW 26.27**.

18. On May 14th, 2019 Defendant County of Snohomish Sheriff’s Department showed bias; and colluded for an improper purpose, without just cause, in N. Jovee’s Child Support proceedings by making attorney for Washington State DSHS Chris Shawn Shaha a “witness” in a criminal investigation of N. Jovee’s mother, Lori Shavlik.

19. On June 18th, 2019 the County of Snohomish Superior Court “enforced” Jurisdiction over the three (3) said minor Jovee Children and one adult party (J. Jovee), all while those said parties were under the Jurisdiction of the State of Oklahoma. The County of Snohomish

Superior Court did not exercise “Emergency Jurisdiction” over any of the parties in accordance with **RCW 26.27**.

20. On September 11th, 2019 N. Jovee was told by the Snohomish County Clerk’s Office employee Gena Sanchez-Peña, his only option to seek relief in an “Emergency Jurisdiction” capacity was to “register” his “Foreign Judgment” Parenting Plan in the County of Snohomish Superior Court. N. Jovee “registered” his out of State Custody Determination on this same day for emergency relief due to J. Jovee attempting to “remove” the minor children from the care and custody of N. Jovee in Fife, WA at a 10-minute wrestling weigh-in in violation of **RCW 26.27**. The County of Snohomish Superior Court did not exercise “Emergency Jurisdiction” over any of the parties in accordance with **RCW 26.27**.

21. On October 18th, 2019 County of Snohomish employee Sanda Meeker filed a Notice of Appearance on behalf of “the State of Washington” into County of Snohomish Superior Court Cause No. 19-3-02130-31. No SAAG/SAAP disclosures were made, nor any other disclosures made to the parties.

22. On November 14th, 2019 the County of Snohomish Superior Court removed L. Shavlik, N. Jovee’s mother, from the Courtroom Sua Sponte. This cleared the Courtroom and left no witnesses or support for N. Jovee. This same day County of Snohomish Superior Court “assigned” a GAL without allowing the parties to choose from three (3) GALs as **RCW 26.12.177** allows. The County of Snohomish Superior Court did not exercise “Emergency Jurisdiction” over any of the parties in accordance with **RCW 26.27**.

23. On February 1st, 2020 all County of Snohomish Superior Court Judges and Commissioners

disqualified themselves from hearing case number 19-2-05888-31, *Glenda Matkins v. L. Shavlik* in which the Defendant was L. Shavlik, who is N. Jovee's Mother and the Plaintiff was J. Jovee's Mother, Glenda Matkins.

24. On June 15th, July 8th, and July 29th, 2020 the County of Snohomish Superior Court entered Orders "enforcing" Jurisdiction, without the Court having Subject Matter Jurisdiction, over the three (3) said Minor Children in this case at the same time as the State of Oklahoma. The County of Snohomish Superior Court did not exercise "Emergency Jurisdiction" over any of the parties in accordance with **RCW 26.27**.

25. On April 19th, 2020 the County of Snohomish Superior Court assigned Defendant GAL Dr. Meera Shin to County of Snohomish Superior Court Cause No. 19-3-02130-31 without considering **RCW 26.12** and **RCW 26.27**.

26. On June 29th, 2020 the County of Snohomish Superior Court entered an Order "enforcing" Jurisdiction, without the Court having Subject Matter Jurisdiction, over the three (3) said Minor Children in this case at the same time as the State of Oklahoma. The County of Snohomish Superior Court did not exercise "Emergency Jurisdiction" over any of the parties in accordance with **RCW 26.27**.

27. On July 27th, 2020 the Oklahoma Appellate Court "Affirmed in Part, Reversed in Part, and Remanded with Further Instruction" the Original Oklahoma Custody Determination. Oklahoma Courts retained "home state" Jurisdiction in accordance with the **RCW 26.27**.

28. On August 17th, 2020 Counsel for N. Jovee Ms. Julie Fulton, located in Oklahoma City, OK filed a Petition for Certiorari Review with the Oklahoma Supreme Court. This was



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4 eventually Denied.

5 29. On August 19th, 2020 the County of Snohomish Superior Court entered Orders “enforcing”  
6 Jurisdiction, without the Court having Subject Matter Jurisdiction, over the three (3) said  
7 Minor Children in this case at the same time as the State of Oklahoma. The County of  
8 Snohomish Superior Court did not exercise “Emergency Jurisdiction” over any of the  
9 parties in accordance with **RCW 26.27**.  
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11 30. On August 20th, 2020 @ 12:38 p.m. N. Jovee sent an email to the County of Snohomish  
12 Executive explaining what was happening with Defendant GAL Dr. Meera Shin in an  
13 attempt to seek relief and file a GAL complaint. The County of Snohomish Executive did  
14 not respond.

15 31. On August 21st, 2020 N. Jovee filed a GAL complaint with the County of Snohomish  
16 Superior Court on GAL Dr. Meera Shin.  
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18 32. On August 26th, 2020 the County of Snohomish Superior Court listed the three (3) said  
19 Minor Jovee Children and J. Jovee on a Washington State Protection Order. The County of  
20 Snohomish Superior Court did not exercise “Emergency Jurisdiction” over any of the  
21 parties in accordance with **RCW 26.27**.  
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23 33. On September 25th, 2020 County of Snohomish Superior Court dismissed N. Jovee’s said  
24 GAL Complaint. County of Snohomish Superior Court employee Jennifer Langbehn,  
25 specifically, dismissed this GAL Complaint without disclosing she was previously  
26 employed by County of Snohomish Superior Court employee Patrick Moriarty; who started  
27 the said violations against N. Jovee by assigning GAL’s to County of Snohomish Superior  
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4 Court Cause No. 19-3-02130-31. Further, it was discovered Defendant L.M.E., INC was  
5 the Legal Service Provider who was making decisions and/or giving legal advice regarding  
6 N. Jovee's GAL Complaints.

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8 34. On October 7th, 2020 N. Jovee filed a Motion to Dismiss GAL Dr. Meera Shin; Motion to  
9 Change Venue; Motion to Disqualify all Snohomish County Judges and Commissioners  
10 due to a "Public Records Request" showing extensive communication between Court  
11 Administrative employees and GAL Dr. Meera Shin. GAL Dr. Meera Shin asked the Court  
12 "what is your advice with this parent"; GAL Dr. Meera Shin is no longer giving her opinion  
13 in her Report, the Court Staff has also contributed.

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15 35. On October 21st, 2020 a hearing was held on N. Jovee's Motion to Dismiss GAL Dr.  
16 Meera Shin; Motion to Change Venue; Motion to Disqualify all Snohomish County Judges  
17 and Commissioners. GAL Dr. Meera Shin stated in open Court "no" email Service  
18 agreement was in place between herself and N. Jovee.

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20 36. On October 21st, 2020 a hearing was held on N. Jovee's Motion to Dismiss GAL Dr.  
21 Meera Shin; Motion to Change Venue; Motion to Disqualify all Snohomish County Judges  
22 and Commissioners. County of Snohomish Superior Court called Defendant Jim  
23 Simoneschi to the Courtroom. N. Jovee disclosed to all parties he suffers from hearing  
24 impairments; received while serving on active duty in the United States Armed Forces.  
25 Defendant Jim Simoneschi assaulted N. Jovee by placing his knuckles in a fist and placing  
26 the knuckles into the middle of N. Jovee's lower spine and applying extreme pressure; to  
27 which the day before N. Jovee seen his medical professional for two (2) herniated discs in  
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4 his lower spine ascertained while serving on Active Duty in the United States Armed  
5 Forces. Further, Defendant Jim Simoneschi attempted to “provoke” N. Jovee into a  
6 physical altercation by “chest bumping” N. Jovee and repeatedly stating: “what are you  
7 going to do about it”; to which failed to provoke N. Jovee. This is what N. Jovee is doing  
8 about it.  
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10 37. On October 28th, 2020 @ 10:12 a.m. N. Jovee sent an email to the County of Snohomish  
11 Executive explaining what happened with Defendant Jim Simoneschi and the County of  
12 Snohomish Superior Court in an attempt to seek relief and file a complaint. The County of  
13 Snohomish Executive did not respond.

14 38. On October 29th, 2020 Defendant GAL Dr. Meera Shin, filed into the County of  
15 Snohomish Superior Court an Official GAL Report into Cause No. 19-3-02130-31.  
16 Defendant GAL Dr. Meera Shin included factual lies in her GAL Report. This was done  
17 with collusion between Defendant’s County of Snohomish, GAL Dr. Meera Shin and/or  
18 L.M.E., INC.  
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20 39. On October 29th, 2020 GAL Dr. Meera Shin submitted a Motion for Judgment and Order  
21 RE Guardian Ad Litem Fees into Cause No. 19-3-02130-31.

22 40. On November 6th, 2020 N. Jovee filed an Amended Motion to Dismiss GAL Dr. Shin,  
23 Motion to Disqualify all County of Snohomish Superior Court Judges and Commissioners,  
24 and Change Venue to Skagit County Superior Court.  
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26 41. On November 18th, 2020 Defendant GAL Dr. Meera Shin filed a “Motion for Judgment  
27 and Order re GAL Fees”.  
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42. On November 20th, 2020 N. Jovee filed a second GAL Complaint upon Defendant GAL Dr. Meera Shin alleging violations of GAL Rules and Defendant GAL Dr. Meera Shin including factual lies in her GAL Report into Cause No. 19-302130-31. Further, it was discovered Defendant L.M.E., INC was the Legal Services Provider who was making decisions and/or giving legal advice regarding N. Jovee's GAL Complaints.

43. On November 20th, 2020 @ 4:56 p.m. N. Jovee sent an email to the County of Snohomish Executive explaining what was happening with Defendant GAL Dr. Meera Shin and the County of Snohomish Superior Court in an attempt to seek relief and file a GAL complaint. The County of Snohomish Executive did not respond.

44. On November 30th, 2020 the County of Snohomish Superior Court assigned pro-tem Commissioner Geoffrey Gibbs; who already had significant conflicts of interest involving N. Jovee. County of Snohomish Superior Court made no disclosures to the parties. N. Jovee had an active lawsuit, Cause No. 18-2-01818-31, involving County of Snohomish Superior Court pro-tem Commissioner Geoffrey Gibbs; before he was assigned to hear any Motions on this case and before County of Snohomish Superior Court assigned him to this case.

45. On December 4th, 2020 County of Snohomish Superior Court pro-tem Commissioner Geoffrey Gibbs "Amended" his "Order Denying" N. Jovee's Motions in Cause No. 19-3-02130-31.

46. On December 11th, 2020 N. Jovee received an email from County of Snohomish Superior Court making a finding of one (1) violation of the GAL Rules, and asked N. Jovee to

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4 “Supplement” his GAL Complaint to include further evidence for clarity and to address the  
5 other issues in the complaint.

6 47. On December 12th, 2020 N. Jovee sent a “Supplemental” GAL Complaint to include  
7 further evidence for “clarity”.

8 48. On December 14th, 2020 N. Jovee filed a Motion to Reconsider County of Snohomish  
9 Superior Court’s Order Denying N. Jovee’s Motion to Dismiss GAL Dr. Meera Shin,  
10 Motion to Disqualify all Snohomish County Superior Court Judges and Commissioners,  
11 and Change Venue to Skagit County Superior Court; into Cause No. 19-3-02130-31.

12 49. On January 6th, 2021 @ 8:31 p.m. N. Jovee sent an email to the County of Snohomish  
13 Executive explaining what was happening with GAL Dr. Meera Shin and the County of  
14 Snohomish Superior Court in an attempt to seek relief and file a GAL complaint. N. Jovee  
15 also explained the Court and/or County was in violation of the Washington State Court  
16 Rules: Superior Court Guardian ad Litem Rules as more than twenty-five (25) days elapsed  
17 since N. Jovee filed his GAL complaint. The County of Snohomish Executive did not  
18 respond.  
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20 50. On January 11th, 2021 @ 5:02 p.m. N. Jovee sent an email to the County of Snohomish  
21 Executive explaining what was happening with GAL Dr. Meera Shin and the County of  
22 Snohomish Superior Court in an attempt to seek relief. The County of Snohomish  
23 Executive did not respond.  
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25 51. On January 11th, 2021 N. Jovee received a response to his GAL Complaint from the  
26 County of Snohomish Superior Court; making a finding of ZERO (0) violations of the GAL  
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Rules; even after previously stating one (1) finding of a violation of the GAL Rules.

52. On March 3rd, 2021 GAL Dr. Meera Shin submitted a Third (3rd) Motion for Judgment and Order RE Guardian Ad Litem Fees. This Motion was denied.

53. On March 19th, 2021 a hearing was held in front of Defendant L.M.E., INC; who was newly “appointed” as a County of Snohomish Commissioner; County of Snohomish Superior Court Cause No. 19-3-02130-31. Before this Motion was brought forth, N. Jovee asked Defendant L.M.E., INC about their relation to Defendant GAL Dr. Meera Shin. Defendant L.M.E., INC denied a conflict-of-interest, denied knowing GAL Dr. Meera Shin or anything about her and proceeded to hear Motions brought by all parties. The County of Snohomish Superior Court did not exercise “Emergency Jurisdiction” over any of the parties in accordance with **RCW 26.27**.

54. On March 22nd, 2021 N. Jovee submitted a Third (3rd) GAL complaint to the County of Snohomish Superior Court due to GAL Dr. Meera Shin, again, retaliating upon N. Jovee by fraudulently submitting “cost bills”; putting N. Jovee’s Social Security Number into the Public Court Record; and not getting prior approval before asking for more than \$1,300 in a “County Pay” case.

55. On March 22nd, 2021 @ 1:50 p.m. N. Jovee sent an email to the County of Snohomish Executive explaining what was happening with GAL Dr. Meera Shin and the County of Snohomish Superior Court in an attempt to seek relief and file a GAL complaint. The County of Snohomish Executive did not respond.

56. On March 24th, 2021 Defendant GAL Dr. Meera Shin filed a Motion to Seal COST BILL

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4 UPDATED on 3 12 21, REPLY to Nathan's Response to Motion for an Additional GAL  
5 fee, and REPLY to Nathan's Response to Motion for Legal Messenger.

6 57. On April 2nd, 2021 Defendant GAL Dr. Meera Shin submitted a Fourth (4th) Motion for  
7 Additional GAL Fees or Dismiss GAL.

8 58. On June 8th, 2021 the Bryan County District Court of Oklahoma re-entered the Remanded  
9 Custody Determination in accordance with **RCW 26.27** and declaring "Home State" over  
10 N. Jovee, J. Jovee, and their three (3) said minor children in accordance with **RCW 26.27**  
11 the UCCJEA. Oklahoma maintained Jurisdiction for all purposes and in accordance with  
12 **RCW 26.27** the UCCJEA.  
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14 59. On July 13th, 2021 @ 10:52 a.m. N. Jovee sent an email to the County of Snohomish  
15 Executive explaining what was happening with GAL Dr. Meera Shin and the County of  
16 Snohomish Superior Court in an attempt to seek relief. The County of Snohomish  
17 Executive did not respond.  
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19 60. On or about July, 2021 N. Jovee personally served County of Snohomish employee Joseph  
20 Genster. During this process service of Mr. Genster, he made derogatory remarks about my  
21 lower back disability and laughed. This was all caught on video as seen on YouTube.

22 61. On September 9th, September 23rd, and October 6th, 2021 the County of Snohomish  
23 Superior Court entered Orders "enforcing" Jurisdiction, without the Court having Subject  
24 Matter Jurisdiction, over the three (3) said Minor Children in this case at the same time as  
25 Oklahoma. The County of Snohomish Superior Court did not exercise "Emergency  
26 Jurisdiction" over any of the parties in accordance with **RCW 26.27**.  
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62. On October 8th, 2021 N. Jovee's Custody Determination from the State of Oklahoma was entered into the County of Snohomish Superior Court and "confirmed" in accordance with **RCW 26.27** the UCCJEA.

63. On October 22nd, 2021 the County of Snohomish Superior Court entered Orders "enforcing" Jurisdiction and "modifying" N. Jovee's Oklahoma Custody Determination, without the Court having Subject Matter Jurisdiction, over the three (3) said Minor Children in this case at the same time as the State of Oklahoma. The County of Snohomish Superior Court did not exercise "Emergency Jurisdiction" over any of the parties in accordance with **RCW 26.27**.

**First Cause of Action  
(Negligence against Defendants)**

64. N. Jovee repeats and incorporates herein by reference the allegations of paragraphs 1 through 63, as set forth below at length.

65. The above-described actions by Defendants County of Snohomish, L.M.E., INC and GAL Dr. Meera Shin; as well as, the above-described actions causing bodily-harm injury and/or exacerbating current injuries and assault by Defendant Jim Simoneschi and by proxy, Defendant County of Snohomish Sheriff was directly and proximately caused by the negligence, negligent legal malpractice, negligent entrustment, negligent misrepresentation and/or gross negligence, and the willful and wonton or reckless conduct of the above-named Defendants, whose actions were in violation of, not limited to the following statutes and Washington State Court Rules: **RCW 9A.36; RCW 19.86, RCW 26.12, RCW 26.27,**

**RCW 26.44**, Washington State Court Rules: Superior Court Guardian ad Litem Rules.

66. Because of his injuries, N. Jovee was and has been required to seek medical treatment for his injuries, which result/ed in medical expenses and costs.

**Second Cause of Action  
(Intentional Infliction of Emotional Distress)**

67. N. Jovee repeats and incorporates herein by reference the allegations of paragraphs 1 through 66, as set forth below at length.

68. The tort for intentional infliction of emotional distress has four (4) elements: (1) the Defendant must act intentionally or recklessly; (2) the Defendant's conduct must be extreme and outrageous; and (3) the conduct must be the cause; (4) of severe emotional distress.

69. In this case Defendant's, and each of them, acted intentionally and recklessly when they acted together in collusion, refusing to intervene and/or alert proper authorities as required under ethics laws/rules, provided false testimony, admitted they gave false testimony, had knowledge of the false testimony and encouraged the parties to continue litigation without correcting the false testimony, made derogatory remarks to N. Jovee in an attempt to provoke N. Jovee into violence, attempting to force N. Jovee to be "mentally evaluated" with no causation and failure to prevent GAL Dr. Meera Shin from recommending "suspension" of N. Jovee's Oklahoma Court Ordered visitation with his three (3) minor boys.

70. In this case Defendant's, and each of them, conduct was extreme and outrageous as they

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2  
3  
4 attempted to collude to alienate N. Jovee's minor children from their Father, violate Court  
5 Ordered Visitation, allowing and entering N. Jovee's Social Security Number into the  
6 Public Court Record, covering-up prior violations of Washington State Superior Court GAL  
7 Rule violations, failing to disclose conflicts-of-interest and assaulting N. Jovee in an  
8 attempt to get a reaction and provocation of violence were extreme and outrageous.  
9

10 71. The conduct of Defendant's, and each of them, was the cause of and/or exacerbated N.  
11 Jovee's anxiety, post-traumatic stress, emotional distress, lower spine injury, hip injuries  
12 and/or pain and suffering from extreme pressure being applied to N. Jovee's two (2)  
13 herniated discs located in his lower spine.

14 72. N. Jovee was, is and/or the actions of the Defendants have exacerbated N. Jovee's anxiety  
15 and/or post-traumatic stress as a result of the Defendants actions of attempting to alienate  
16 the Jovee minor children from their Father. N. Jovee was, is and/or the actions of the  
17 Defendants have exacerbated N. Jovee's anxiety and/or post-traumatic stress as a result of  
18 the Defendants actions of applying extreme pressure to my lower spine. N. Jovee was and  
19 is still suffering from pain and suffering due to extreme pressure being applied to N.  
20 Jovee's two (2) herniated discs located in his lower spine by Defendant Jim Simoneschi. N.  
21 Jovee has been required to seek medical treatment for his injuries, which result/ed in  
22 expenses and costs.  
23

24  
25 73. As a direct and proximate result of Defendant's negligence, N. Jovee has been damaged in  
26 a sum within the Jurisdiction of this Court and in an amount according to proof, including  
27 but not limited to general and special damages, anxiety and/or post-traumatic stress disorder  
28



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4 and/or exacerbating N. Jovee's anxiety and/or post-traumatic stress disorder, medical  
5 expenses, loss of wages, loss of consortium, and pain and suffering, and such other ordinary  
6 and reasonable expenses due to the actions of the Defendants. N. Jovee will seek leave of  
7 the Court to Amend this Complaint to allege the exact amount of said damages when said  
8 sum is fully ascertained.  
9

10 74. If Defendant/s shall allege there is a party or non-party at fault (CR 12(I)), and Defendant/s  
11 are successful in sustaining their burden of proof against said potential other non-parties,  
12 and the tier of facts finds that any non-party or party as may be hereafter brought into this  
13 action is at fault, then N. Jovee shall also be entitled to a Judgement against said other  
14 parties or non-parties against whom Defendant/s have prevailed (CR 8).  
15

16  
17 **Third Cause of Action**  
**(Washington State Consumer Protection Act)**

18 75. N. Jovee repeats and incorporates herein by reference the allegations of paragraphs 1  
19 through 74, as set forth below at length.  
20

21 76. A Plaintiff may file and enjoin a claim for damages for any and all violations of **RCW**  
22 **19.86.020, 19.86.030, 19.86.040, 19.86.050, or 19.86.060** in Superior Court under **RCW**  
23 **19.86.090**.  
24

25 77. To have a claim under the Washington State Consumer Protection Act alleged under **RCW**  
26 **19.86.020**, the Plaintiff must satisfy element one (1) and two (2) or three (3), the third  
27 element having three (3) sub-elements (a - c); in a private action to which an unfair or  
28 deceptive act or practice is injurious to the public interest; as specified under **RCW**

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4 **19.86.093**, because it: (1) violates a statute that is incorporated under **RCW 19.86**; (2)  
5 violates a statute that contains a specific legislative declaration of public interest impact; or  
6 (3)(a) injured other persons; (b) had the capacity to injure other persons; or (c) has the  
7 capacity to injure other persons.

8  
9 78. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and the County of  
10 Snohomish have violated **RCW 19.86.030**. Every contract, combination, in the form of  
11 trust or otherwise, or conspiracy in restraint of trade or commerce is declared unlawful. See  
12 **RCW 19.86.030**. Defendant/s L.M.E., INC was contracted with the County of Snohomish  
13 for Legal Services at the same time GAL Dr. Meera Shin was contracted with the County of  
14 Snohomish for GAL Services under **Title 26; RCW**. L.M.E., INC was making Legal  
15 recommendations and/or giving legal advice to the County of Snohomish directly relating  
16 to N. Jovee's GAL Complaints upon County of Snohomish contracted GAL Dr. Meera  
17 Shin. GAL Dr. Meera Shin was getting legal advice from the County of Snohomish  
18 employees. Defendant/s L.M.E., INC and GAL Dr. Meera Shin have both been monetary  
19 compensated for their actions by the County of Snohomish. Under **RCW 19.86.030**,  
20 contracts and/or a combination of contracts cannot conspire "in restraint of trade or  
21 commerce"; as N. Jovee asserts has happened in this case. Under the above set-forth  
22 elements for violation of the Washington State Consumer Protection Act; N. Jovee asserts  
23 the above related actions in violation of **RCW 19.86.030** can also be compensated under  
24 **RCW 19.86.020**; as long as it meets the criterion set forth above, as: (1) N. Jovee asserts  
25 violation of **RCW 19.86.030** meets the requirement set forth in element (1); (2) N. Jovee  
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4 asserts this violation also conforms to element (2) as the **RCW 26.27** the UCCJEA and  
5 **RCW 26.12** contains specific legislative declarations of public interest impact; and (3) N.  
6 Jovee asserts as a result of the above alleged actions, criterion set forth under element (3)  
7 have been met as Defendant/s (a) have injured other persons, specifically Ms. Christie  
8 Cano; or (b) had the capacity to injure other persons; or (c) still has the capacity to injure  
9 other persons as the Defendant L.M.E., INC is an active business entity and GAL Dr.  
10 Meera Shin is, to N. Jovee's best knowledge and belief, an active GAL in the State of  
11 Washington.  
12

13 79. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and the County of  
14 Snohomish have violated **RCW 19.86.040**. It shall be unlawful for any person to  
15 monopolize, or attempt to monopolize or combine or conspire with any other person or  
16 persons to monopolize any part of trade or commerce. See **RCW 19.86.040**. Defendant  
17 L.M.E., INC was/is contracted with the County of Snohomish for Legal Services. L.M.E.,  
18 INC was making Legal recommendations and/or giving legal advice to the County of  
19 Snohomish directly relating to N. Jovee's GAL Complaints upon County of Snohomish  
20 contracted GAL Dr. Meera Shin. Upon completion of N. Jovee's 2nd GAL Complaint,  
21 Defendant County of Snohomish "acquired" L.M.E., INC's Registered and Governing  
22 Agent to become a County of Snohomish Superior Court Commissioner to sit and hear  
23 Motions regarding the same "GAL Complaints" submitted by N. Jovee. Under **RCW**  
24 **19.86.040**, no person can monopolize, or "attempt to monopolize" or combine or conspire  
25 with any other person or persons to monopolize any part of trade or commerce; as N. Jovee  
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4 asserts has happened in this case. Under the above set-forth elements for violation of the  
5 Washington State Consumer Protection Act; N. Jovee asserts the above related actions in  
6 violation of **RCW 19.86.040** can also be compensated under **RCW 19.86.020**; as long as it  
7 meets the criterion set forth above, as: **(1)** N. Jovee asserts violation of **RCW 19.86.040**  
8 meets the requirement set forth in element (1); **(2)** N. Jovee asserts this violation also  
9 conforms to element (2) as **RCW 26.27** the UCCJEA, **RCW 26.12**, Washington State  
10 Doctor and Attorney ethics laws containing specific legislative declarations of public  
11 interest impact; and/or **(3)** N. Jovee asserts as a result of the above alleged actions, criterion  
12 set forth under element (3) have been met as Defendant/s (a) have injured other persons,  
13 specifically N. Jovee's minor children and other minor children of the public; or (b) had the  
14 capacity to injure other persons, specifically N. Jovee's minor children and other minor  
15 children of the public; or (c) still has the capacity to injure other persons, specifically N.  
16 Jovee's minor children and other minor children of the public as the Defendant L.M.E.,  
17 INC is an active business entity and GAL Dr. Meera Shin is, to N. Jovee's best knowledge  
18 and belief, an active GAL in the State of Washington.

21 80. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and/or the County of  
22 Snohomish have violated **RCW 19.86.060**. It shall be unlawful for any corporation to  
23 acquire, directly or indirectly, the whole or any part of the stock or assets of another  
24 corporation where the effect of such acquisition may be to substantially lessen competition  
25 or tend to create a monopoly in any line of commerce. See **RCW 19.86.060**. Defendant  
26 L.M.E., INC was/is contracted with the County of Snohomish for Legal Services. L.M.E.,  
27  
28



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4 INC was making Legal recommendations and/or giving legal advice to the County of  
5 Snohomish directly relating to N. Jovee's GAL Complaints upon County of Snohomish  
6 contracted GAL Dr. Meera Shin. Upon completion of N. Jovee's 2nd GAL Complaint,  
7 Defendant County of Snohomish "acquired" L.M.E., INC by appointing its Registered and  
8 Governing Agent to become a County of Snohomish Superior Court Commissioner to sit  
9 and hear Motions regarding the same "GAL Complaints" submitted by N. Jovee. Under  
10 **RCW 19.86.060**, no corporation can acquire, directly or indirectly, the whole or any part of  
11 the stock or assets of another corporation where the effect of such acquisition may be to  
12 substantially lessen competition or "tend to create a monopoly in any line of commerce"; as  
13 N. Jovee asserts has happened in this case. Under the above set-forth elements for violation  
14 of the Washington State Consumer Protection Act; N. Jovee asserts the above related  
15 actions in violation of **RCW 19.86.060** can also be compensated under **RCW 19.86.020**; as  
16 long as it meets the criterion set forth above, as: (1) N. Jovee asserts violation of **RCW**  
17 **19.86.060** meets the requirement set forth in element (1); (2) N. Jovee asserts this violation  
18 also conforms to element (2) as the Washington State Constitution, the **RCW 26.27** the  
19 UCCJEA, **RCW 26.12**, Washington State Doctor and Attorney ethics laws containing  
20 specific legislative declarations of public interest impact; and/or (3) N. Jovee asserts as a  
21 result of the above alleged actions, criterion set forth under element (3) have been met as  
22 Defendant/s (a) have injured other persons, specifically N. Jovee's minor children and other  
23 minor children of the public; or (b) had the capacity to injure other persons, specifically N.  
24 Jovee's minor children and other minor children and members of the public; or (c) still has  
25  
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4 the capacity to injure other persons, specifically N. Jovee's minor children and other minor  
5 children and members of the public as the Defendant L.M.E., INC is an active business  
6 entity and GAL Dr. Meera Shin is, to N. Jovee's best knowledge and belief, an active GAL  
7 in the State of Washington.

8  
9 81. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and/or the County of  
10 Snohomish have violated **RCW 19.86.020** on each date a hearing was held in front of  
11 L.M.E., INC involving GAL Dr. Meera Shin's GAL violations.

12 82. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and/or the County of  
13 Snohomish have violated **RCW 19.86.020** on each occasion GAL Dr. Meera Shin filed a  
14 fraudulent and/or false statement into and/or on the Official Court Record.

15 83. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and/or the County of  
16 Snohomish have violated **RCW 19.86.020** on each occasion L.M.E., INC filed a fraudulent  
17 and/or false statement into and/or on the Official Court Record.

18  
19 84. Defendant/s GAL Dr. Meera Shin and L.M.E., INC both maintained contracts with the  
20 County of Snohomish; which all have a "duty to the public" in their official capacity as a  
21 GAL, Doctor and/or as an Attorney at Law. Further, N. Jovee asserts Defendant/s GAL Dr.  
22 Meera Shin and L.M.E., INC both had a further duty to N. Jovee and the three (3) minor  
23 Jovee boys when reviewing misconduct and/or abuse claims directly relating to the minor  
24 Jovee children.

25  
26 85. As prescribed under **RCW 19.86.140**, Civil Penalties are also awarded for violations of  
27 **RCW 19.86.020, RCW 19.86.030** and/or **RCW 19.86.040**.

86. N. Jovee requests a penalty for each individual Defendant, found liable, who violated **RCW 19.86.030** and/or **RCW 19.86.040** of not more than \$180,000.00. For every Defendant, other than an individual who violated **RCW 19.86.030** and/or **RCW 19.86.040**, N. Jovee requests a penalty of not more than \$900,000.00.

87. N. Jovee requests an “enhanced penalty of \$5,000” as prescribed under **RCW 19.86.140** for the Defendants actions of “targeting” N. Jovee; a “physically disabled veteran”.

### **Prayer for Relief**

88. WHEREFORE, N. Jovee prays as follows:

- 1) For an award of damages compensating N. Jovee in an amount to be proven at trial;
- 2) For an award of civil penalties in an amount to be proven at trial and/or prescribed under **RCW 19.86.140**;
- 3) For an award of costs compensating N. Jovee for his costs of suit incurred herein;
- 4) For an award of fees under **RCW 4.84** or as otherwise permitted by law; and
- 5) Any other relief requested in this Complaint and/or such other relief as the Court may find just and proper.

### **Reservation of Rights**

89. N. Jovee reserves the right to amend his complaint further and conduct discovery relevant to this suit.

**Jury Trial Demanded**

90. N. Jovee seeks a 12 - person Jury Trial on all matters; pursuant to CR 38 and the Washington State Constitution.

DATED this \_\_\_ day of April 2022 at Everett, Washington.

Respectfully submitted,

---

Nathan Jovee, Pro Se litigant;  
Honorably Discharged Disabled  
Iraqi War Veteran



# Exhibit B

22-2-00076-29  
CMP 5  
Complaint  
11719427



FILED  
SKAGIT COUNTY CLERK  
SKAGIT COUNTY, WA

2022 JAN 24 PM 1:37

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF SKAGIT

NATHAN JOVEE,

Plaintiff,

vs.

MEERA SHIN as a County of Snohomish  
contracted Guardian Ad Litem, COUNTY  
OF SNOHOMISH as a sub-division of the  
State of Washington, COUNTY OF  
SNOHOMISH SHERIFF, DEPUTY  
SHERIFF JIM SIMONESCHI as a County  
of Snohomish Deputy Sheriff, L.M.E., INC,  
as a Legal Services Provider for the County  
of Snohomish and DOES 1 - 50,

Defendants.

Case No. 22-2-00076-29

Judge:

PLAINTIFF'S COMPLAINT FOR  
DAMAGES FOR:

- (1) Negligence;
- (2) Intentional Infliction of Emotional  
Distress; and
- (3) The Washington State Consumer  
Protection Act.

JURY TRIAL DEMANDED

COMES NOW; Plaintiff N. Jovee, a Pro Se indigent litigant, in this case who  
alleges as follows:

**General Allegations**

**1. Plaintiff:**

At all times relevant to this Complaint, N. Jovee was and is currently a resident of the  
County of Snohomish, located in Washington State; 425-530-7435; [njovee@gmail.com](mailto:njovee@gmail.com).

1 2. Defendants:

2 **Defendant No. 1**

3 At all times applicable herein, the County of Snohomish was and is a public entity of the  
4 State of Washington.  
5

6  
7 **Defendant No. 2**

8 N. Jovee asserts, on information and belief, at all times herein the County of Snohomish  
9 Sheriff and County of Snohomish Sheriff's Department are independently elected sub-divisions  
10 of the County of Snohomish and the State of Washington. Defendant County of Snohomish is  
11 vicariously liable for the actions of Defendants County of Snohomish Sheriff/Department under  
12 *respondeat superior* and other principles of agency law, such as, but not limited to, master-  
13 servant.  
14

15  
16 **Defendant No. 3**

17 N. Jovee asserts, on information and belief, at all times herein Defendant County of  
18 Snohomish Deputy Sheriff Jim Simoneschi is a resident of the County of Snohomish and is  
19 employed by the County of Snohomish Sheriff and/or the County of Snohomish and was within  
20 the course and scope of his employment as Deputy Sheriff. Defendant County of Snohomish  
21 and/or County of Snohomish Sheriff is vicariously liable for the actions of Defendant Jim  
22 Simoneschi under *respondeat superior* and other principles of agency law, such as, but not  
23 limited to, master-servant.  
24  
25  
26  
27  
28



**Defendant No. 4**

N. Jovee asserts, on information and belief, at all times herein Defendant Guardian Ad Litem (GAL) Doctor Meera Shin is a resident of the County of King and is or was contracted and/or employed by the County of Snohomish and was within the course and scope of her employment and/or contract as a County of Snohomish GAL. Defendants County of Snohomish and/or L.M.E., INC, as a "business entity", is vicariously liable for the actions of Defendant GAL Dr. Meera Shin under *respondeat superior* and other principles of agency law, such as, but not limited to, master-servant.

**Defendant No. 5**

N. Jovee asserts, on information and belief, at all times herein Defendant L.M.E., INC, the Registered and Governing Agent Lisa Micheli as Attorney at Law is an Active Business entity located at 1301 56TH ST SW, Everett, WA, 98203 in the County of Snohomish and was and/or is contracted with the County of Snohomish and was within the course and scope of her contract for Legal Services for the County of Snohomish. Defendant County of Snohomish and/or L.M.E., INC, as a "business entity", is vicariously liable for the actions of Defendant/s L.M.E., INC and GAL Dr. Meera Shin; under *respondeat superior* and other principles of agency law, such as, but not limited to, master-servant.

**Defendant No. 6**

N. Jovee is ignorant of the true names and capacities of those Defendants sued herein as DOES 1 through 50, and for that reason has sued such Defendants under such fictitious names. N. Jovee reserves his Rights, and will seek leave of Court to Amend this Complaint to identify

1 said Defendants when their identities have been ascertained. N. Jovee is informed each of the  
2 factitiously named Defendants was in some manner liable and legally responsible, in that their  
3 conduct caused damages and injuries set forth herein.

4  
5 3. N. Jovee claims this case involves Defendant County of Snohomish; allowing the Skagit  
6 County Superior Court to assume Jurisdiction and assert this is the proper Venue as  
7 prescribed under RCW 36.01.050(1).

8  
9 4. A claim for damages was properly filed with Defendant County of Snohomish. More than  
10 sixty (60) days have elapsed without a response from any Defendant. Attached hereto as  
11 **Exhibit 1** is a true and correct copy of N. Jovee's claim for damages submitted to the County  
12 of Snohomish Auditor's Office/Risk Management.

#### 13 14 **Background of Facts**

15 5. N. Jovee married Jolene Marie Matkins, herein J. Jovee on November 27th, 2006 in Everett,  
16 Washington while he was serving on Active Duty in the United States Armed Forces. The  
17 marriage produced three sons, LJ (10/2008), SJ (10/2011), and BJ (12/2014). All three  
18 children had a close relationship with each other and had an equally as strong bond with their  
19 father, N. Jovee, and Mother J. Jovee.

20  
21 6. The Marriage ended when J. Jovee filed a Petition for Dissolution of Marriage on May 23rd,  
22 2016. An Automatic Temporary Injunction was entered upon the Parties by the Bryan  
23 County District Court of Oklahoma preventing the parties from removing the minor children  
24 from the State of Oklahoma. During the pendency of the Jovee's Dissolution of Marriage  
25 proceedings in the State of Oklahoma, J. Jovee produced a fourth (4) child in June of 2018;  
26 before the Jovee's were Divorced. A Judgment of Dissolution was entered in September of  
27  
28



1 2018 (Reversed in part 2021). J. Jovee was found Guilty of Contempt of Court by the Bryan  
2 County District Court for the State of Oklahoma in September of 2018 for removing the three  
3 (3) minor children from the State of Oklahoma twelve (12) days after Petitioning the Bryan  
4 County District Court for the State of Oklahoma for a Dissolution of Marriage. This violated  
5 the Oklahoma Automatic injunction entered by the Court after Petitioning for Divorce.  
6

7 7. On December 14th, 2016 J. Jovee began "forum shopping" in Washington State District  
8 Court, Evergreen Division in Monroe, WA, County of Snohomish by initiating Court  
9 proceedings without exercising "Emergency Jurisdiction" as prescribed in RCW 26.27  
10 (UCCJEA); Title 43 O.S. Section 551-101 et seq. (UCCJEA) and Title 10 of the Oklahoma  
11 Statutes, 7700-101, et seq "Uniform Parentage Act".  
12

13 8. On December 14th, 2016 the Bryan County District Court of Oklahoma entered an Order for  
14 Child Support upon N. Jovee in accordance with the UIFSA and in accordance with Title 43  
15 O.S. § 115 and Title 12 O.S. § 1171.3(J)(2); RCW 26.27 and RCW 26.21A.  
16

17 9. On December 27th, 2016 the County of Snohomish was made aware proceedings involving  
18 the three (3) said Minor Children involved in this case and both parents were currently under  
19 the Jurisdiction of the State of Oklahoma in accordance with the UCCJEA; RCW 26.27  
20 (UCCJEA); Title 43 O.S. Section 551-101 et seq. (UCCJEA) and Title 10 of the Oklahoma  
21 Statutes, 7700-101, et seq "Uniform Parentage Act".  
22

23 10. On or about December of 2017 N. Jovee moved from the State of Oklahoma to the State of  
24 Washington. The Bryan County District Court of Oklahoma maintained Jurisdiction over all  
25 parties under the UCCJEA and/or the UIFSA.  
26

27 11. On September 27th, 2018 the Bryan County District Court of Oklahoma entered a Custody  
28 Determination in accordance with the UCCJEA and declaring "Home State" over N. Jovee,



1 J. Jovee, and their three (3) said minor children in accordance with RCW 26.27. Oklahoma  
2 maintained Jurisdiction for purposes of "appeal" and in accordance with the UCCJEA;  
3 confirmed by the Oklahoma State Supreme Court Mandate. N. Jovee hired Counsel, Ms.  
4 Julie Fulton located in Oklahoma City, to file an Appeal on behalf of N. Jovee. This Order  
5 was eventually Reversed in-Part and Remanded with Instruction; June 8th, 2021.  
6

7 12. On October 26th, 2018 N. Jovee filed an appeal through Counsel Ms. Julie Fulton, located in  
8 Oklahoma City, with the Oklahoma Court of Appeals.

9 13. On August 21st, 2018 the minor children's Father N. Jovee made a suspected child abuse  
10 report to the County of Snohomish Department of Children, Youth, and Family Services upon  
11 LJ reporting abuse. A Social Worker did not investigate the allegations due to this report  
12 being "screened out".  
13

14 14. On October 30th, 2018 an "anonymous" reporter from the Sultan Public Elementary School  
15 made a suspected child abuse report to the County of Snohomish Department of Children,  
16 Youth, and Family Services on Jolene for "physical abuse" upon the oldest minor child,  
17 striking and leaving a "red mark" across the child's face.  
18

19 15. On January 10th, 2019 a GAL Complaint was submitted to the King County Superior Court  
20 GAL Committee against Defendant GAL Dr. Meera Shin; claiming HIPPA misconduct and  
21 fraud.  
22

23 16. On February 16th, 2019 an incident occurred where J. Jovee, the mother of the three (3) said  
24 Minor Children in this case, attempted to "remove" the three (3) said Minor Children from  
25 the care and custody of N. Jovee, on N. Jovee's Court Ordered visitation time. The said  
26 Minor Children were returned to the safety of N. Jovee by the Washington State City of Fife  
27  
28

1 Police Department to finish said visitation time with Father as allotted under the Court  
2 Ordered Oklahoma Custody Determination.

3 17. On April 26th, 2019 N. Jovee made Defendant's County of Snohomish and L.M.E., INC  
4 aware by filing a Declaration, that a Custody Determination was already in place by the Bryan  
5 County District Court of the State of Oklahoma; and in accordance with RCW 26.27.  
6

7 18. On May 14th, 2019 Defendant County of Snohomish Sheriff's Department showed bias; and  
8 colluded for an improper purpose, without just cause, in N. Jovee's Child Support  
9 proceedings by making attorney for Washington State DSHS Chris Shawn Shaha a "witness"  
10 in a criminal investigation of N. Jovee's mother, Lori Shavlik.  
11

12 19. On June 18th, 2019 the County of Snohomish Superior Court "enforced" Jurisdiction over  
13 the three (3) said minor Jovee Children and one adult party (J. Jovee), all while those said  
14 parties were under the Jurisdiction of the State of Oklahoma. The County of Snohomish  
15 Superior Court did not exercise "Emergency Jurisdiction" over any of the parties in  
16 accordance with RCW 26.27.  
17

18 20. On September 11th, 2019 N. Jovee was told by the Snohomish County Clerk's Office  
19 employee Gena Sanchez-Peña, his only option to seek relief in an "Emergency Jurisdiction"  
20 capacity was to "register" his "Foreign Judgment" Parenting Plan in the County of  
21 Snohomish Superior Court. N. Jovee "registered" his out of State Custody Determination on  
22 this same day for emergency relief due to J. Jovee attempting to "remove" the minor children  
23 from the care and custody of N. Jovee in Fife, WA at a 10 minute wrestling weigh-in in  
24 violation of RCW 26.27. The County of Snohomish Superior Court did not exercise  
25 "Emergency Jurisdiction" over any of the parties in accordance with RCW 26.27.  
26  
27  
28



1 21. On October 18th, 2019 County of Snohomish employee Sanda Meeker filed a Notice of  
2 Appearance on behalf of "the State of Washington" into County of Snohomish Superior Court  
3 Cause No. 19-3-02130-31. No SAAG/SAAP disclosures were made, nor any other  
4 disclosures made to the parties.  
5

6 22. On November 14th, 2019 the County of Snohomish Superior Court removed L. Shavlik, N.  
7 Jovee's mother, from the Courtroom Sua Sponte. This cleared the Courtroom and left no  
8 witnesses or support for N. Jovee. This same day County of Snohomish Superior Court  
9 "assigned" a GAL without allowing the parties to choose from three (3) GALs as RCW  
10 26.12.177 allows. The County of Snohomish Superior Court did not exercise "Emergency  
11 Jurisdiction" over any of the parties in accordance with RCW 26.27.  
12

13 23. On February 1st, 2020 all County of Snohomish Superior Court Judges and Commissioners  
14 disqualified themselves from hearing case number 19-2-05888-31, *Glenda Matkins v. L.*  
15 *Shavlik* in which the Defendant was L. Shavlik, who is N. Jovee's Mother and the Plaintiff  
16 was J. Jovee's Mother, Glenda Matkins.  
17

18 24. On June 15th, July 8th, and July 29th, 2020 the County of Snohomish Superior Court entered  
19 Orders "enforcing" Jurisdiction, without the Court having Subject Matter Jurisdiction, over  
20 the three (3) said Minor Children in this case at the same time as the State of Oklahoma. The  
21 County of Snohomish Superior Court did not exercise "Emergency Jurisdiction" over any of  
22 the parties in accordance with RCW 26.27.  
23

24 25. On April 19th, 2020 the County of Snohomish Superior Court assigned Defendant GAL Dr.  
25 Meera Shin to County of Snohomish Superior Court Cause No. 19-3-02130-31 without  
26 considering RCW 26.12 and RCW 26.27.  
27  
28



1 26. On June 29th, 2020 the County of Snohomish Superior Court entered an Order “enforcing”  
2 Jurisdiction, without the Court having Subject Matter Jurisdiction, over the three (3) said  
3 Minor Children in this case at the same time as the State of Oklahoma. The County of  
4 Snohomish Superior Court did not exercise “Emergency Jurisdiction” over any of the parties  
5 in accordance with RCW 26.27.  
6

7 27. On July 27th, 2020 the Oklahoma Appellate Court “Affirmed in Part, Reversed in Part, and  
8 Remanded with Further Instruction” the Original Oklahoma Custody Determination.  
9 Oklahoma Courts retained “home state” Jurisdiction in accordance with the RCW 26.27.  
10

11 28. On August 17th, 2020 Counsel for N. Jovee Ms. Julie Fulton, located in Oklahoma City, OK  
12 filed a Petition for Certiorari Review with the Oklahoma Supreme Court. This was eventually  
13 Denied.  
14

15 29. On August 19th, 2020 the County of Snohomish Superior Court entered Orders “enforcing”  
16 Jurisdiction, without the Court having Subject Matter Jurisdiction, over the three (3) said  
17 Minor Children in this case at the same time as the State of Oklahoma. The County of  
18 Snohomish Superior Court did not exercise “Emergency Jurisdiction” over any of the parties  
19 in accordance with RCW 26.27.  
20

21 30. On August 20th, 2020 @ 12:38 p.m. N. Jovee sent an email to the County of Snohomish  
22 Executive explaining what was happening with Defendant GAL Dr. Meera Shin in an attempt  
23 to seek relief and file a GAL complaint. The County of Snohomish Executive did not respond.  
24

25 31. On August 21st, 2020 N. Jovee filed a GAL complaint with the County of Snohomish  
26 Superior Court on GAL Dr. Meera Shin.  
27

28 32. On August 26th, 2020 the County of Snohomish Superior Court listed the three (3) said Minor  
Jovee Children and J. Jovee on a Washington State Protection Order. The County of

1 Snohomish Superior Court did not exercise "Emergency Jurisdiction" over any of the parties  
2 in accordance with RCW 26.27.

3 33. On September 25th, 2020 County of Snohomish Superior Court dismissed N. Jovee's said  
4 GAL Complaint. County of Snohomish Superior Court employee Jennifer Langbehn,  
5 specifically, dismissed this GAL Complaint without disclosing she was previously employed  
6 by County of Snohomish Superior Court employee Patrick Moriarty; who started the said  
7 violations against N. Jovee by assigning GAL's to County of Snohomish Superior Court  
8 Cause No. 19-3-02130-31. Further, it was discovered Defendant L.M.E., INC was the Lagal  
9 Service Provider who was making decisions and/or giving legal advise regarding N. Jovee's  
10 GAL Complaints.  
11

12  
13 34. On October 7th, 2020 N. Jovee filed a Motion to Dismiss GAL Dr. Meera Shin; Motion to  
14 Change Venue; Motion to Disqualify all Snohomish County Judges and Commissioners due  
15 to a "Public Records Request" showing extensive communication between Court  
16 Administrative employees and GAL Dr. Meera Shin. GAL Dr. Meera Shin asked the Court  
17 "what is your advice with this parent"; GAL Dr. Meera Shin is no longer giving her opinion  
18 in her Report, the Court Staff has also contributed.  
19

20 35. On October 21st, 2020 a hearing was held on N. Jovee's Motion to Dismiss GAL Dr. Meera  
21 Shin; Motion to Change Venue; Motion to Disqualify all Snohomish County Judges and  
22 Commissioners. GAL Dr. Meera Shin stated in open Court "no" email Service agreement  
23 was in place between herself and N. Jovee.  
24

25 36. On October 21st, 2020 a hearing was held on N. Jovee's Motion to Dismiss GAL Dr. Meera  
26 Shin; Motion to Change Venue; Motion to Disqualify all Snohomish County Judges and  
27 Commissioners. County of Snohomish Superior Court called Defendant Jim Simoneschi to  
28



1 the Courtroom. N. Jovee disclosed to all parties he suffers from hearing impairments;  
2 received while serving on active duty in the United States Armed Forces. Defendant Jim  
3 Simoneschi assaulted N. Jovee by placing his knuckles in a fist and placing the knuckles into  
4 the middle of N. Jovee's lower spine and applying extreme pressure; to which the day before  
5 N. Jovee seen his medical professional for two (2) herniated discs in his lower spine  
6 ascertained while serving on Active Duty in the United States Armed Forces. Further,  
7 Defendant Jim Simoneschi attempted to "provoke" N. Jovee into a physical altercation by  
8 "chest bumping" N. Jovee and repeatedly stating: "what are you going to do about it"; to  
9 which failed to provoke N. Jovee. This is what N. Jovee is doing about it.

12 37. On October 28th, 2020 @ 10:12 a.m. N. Jovee sent an email to the County of Snohomish  
13 Executive explaining what happened with Defendant Jim Simoneschi and the County of  
14 Snohomish Superior Court in an attempt to seek relief and file a complaint. The County of  
15 Snohomish Executive did not respond.

16 38. On October 29th, 2020 Defendant GAL Dr. Meera Shin, filed into the County of Snohomish  
17 Superior Court an Official GAL Report into Cause No. 19-3-02130-31. Defendant GAL Dr.  
18 Meera Shin included factual lies in her GAL Report. This was done with collusion between  
19 Defendant's County of Snohomish, GAL Dr. Meera Shin and/or L.M.E., INC.

20 39. On October 29th, 2020 GAL Dr. Meera Shin submitted a Motion for Judgment and Order RE  
21 Guardian Ad Litem Fees into Cause No. 19-3-02130-31.

22 40. On November 6th, 2020 N. Jovee filed an Amended Motion to Dismiss GAL Dr. Shin,  
23 Motion to Disqualify all County of Snohomish Superior Court Judges and Commissioners,  
24 and Change Venue to Skagit County Superior Court.



41. On November 18th, 2020 Defendant GAL Dr. Meera Shin filed a "Motion for Judgment and Order re GAL Fees".

42. On November 20th, 2020 N. Jovee filed a second GAL Complaint upon Defendant GAL Dr. Meera Shin alleging violations of GAL Rules and Defendant GAL Dr. Meera Shin including factual lies in her GAL Report into Cause No. 19-302130-31. Further, it was discovered Defendant L.M.E., INC was the Legal Services Provider who was making decisions and/or giving legal advice regarding N. Jovee's GAL Complaints.

43. On November 20th, 2020 @ 4:56 p.m. N. Jovee sent an email to the County of Snohomish Executive explaining what was happening with Defendant GAL Dr. Meera Shin and the County of Snohomish Superior Court in an attempt to seek relief and file a GAL complaint. The County of Snohomish Executive did not respond.

44. On November 30th, 2020 the County of Snohomish Superior Court assigned pro-tem Commissioner Geoffrey Gibbs; who already had significant conflicts of interest involving N. Jovee. County of Snohomish Superior Court made no disclosures to the parties. N. Jovee had an active lawsuit, Cause No. 18-2-01818-31, involving County of Snohomish Superior Court pro-tem Commissioner Geoffrey Gibbs; before he was assigned to hear any Motions on this case and before County of Snohomish Superior Court assigned him to this case.

45. On December 4th, 2020 County of Snohomish Superior Court pro-tem Commissioner Geoffrey Gibbs "Amended" his "Order Denying" N. Jovee's Motions in Cause No. 19-3-02130-31.

46. On December 11th, 2020 N. Jovee received an email from County of Snohomish Superior Court making a finding of one (1) violation of the GAL Rules, and asked N. Jovee to

1 “Supplement” his GAL Complaint to include further evidence for clarity and to address the  
2 other issues in the complaint.

3 47. On December 12th, 2020 N. Jovee sent a “Supplemental” GAL Complaint to include further  
4 evidence for “clarity”.  
5

6 48. On December 14th, 2020 N. Jovee filed a Motion to Reconsider County of Snohomish  
7 Superior Court’s Order Denying N. Jovee’s Motion to Dismiss GAL Dr. Meera Shin, Motion  
8 to Disqualify all Snohomish County Superior Court Judges and Commissioners, and Change  
9 Venue to Skagit County Superior Court; into Cause No. 19-3-02130-31.  
10

11 49. On January 6th, 2021 @ 8:31 p.m. N. Jovee sent an email to the County of Snohomish  
12 Executive explaining what was happening with GAL Dr. Meera Shin and the County of  
13 Snohomish Superior Court in an attempt to seek relief and file a GAL complaint. N. Jovee  
14 also explained the Court and/or County was in violation of the Washington State Court Rules:  
15 Superior Court Guardian ad Litem Rules as more than twenty-five (25) days elapsed since N.  
16 Jovee filed his GAL complaint. The County of Snohomish Executive did not respond.  
17

18 50. On January 11th, 2021 @ 5:02 p.m. N. Jovee sent an email to the County of Snohomish  
19 Executive explaining what was happening with GAL Dr. Meera Shin and the County of  
20 Snohomish Superior Court in an attempt to seek relief. The County of Snohomish Executive  
21 did not respond.  
22

23 51. On January 11th, 2021 N. Jovee received a response to his GAL Complaint from the County  
24 of Snohomish Superior Court; making a finding of ZERO (0) violations of the GAL Rules;  
25 even after previously stating one (1) finding of a violation of the GAL Rules.

26 52. On March 3rd, 2021 GAL Dr. Meera Shin submitted a Third (3rd) Motion for Judgment and  
27 Order RE Guardian Ad Litem Fees. This Motion was denied.  
28



53. On March 19th, 2021 a hearing was held in front of Defendant L.M.E., INC; who was newly "appointed" as a County of Snohomish Commissioner; County of Snohomish Superior Court Cause No. 19-3-02130-31. Before this Motion was brought forth, N. Jovee asked Defendant L.M.E., INC about their relation to Defendant GAL Dr. Meera Shin. Defendant L.M.E., INC denied a conflict-of-interest, denied knowing GAL Dr. Meera Shin or anything about her and proceeded to hear Motions brought by all parties. The County of Snohomish Superior Court did not exercise "Emergency Jurisdiction" over any of the parties in accordance with RCW 26.27.

54. On March 22nd, 2021 N. Jovee submitted a Third (3rd) GAL complaint to the County of Snohomish Superior Court due to GAL Dr. Meera Shin, again, retaliating upon N. Jovee by fraudulently submitting "cost bills"; putting N. Jovee's Social Security Number into the Public Court Record; and not getting prior approval before asking for more than \$1,300 in a "County Pay" case.

55. On March 22nd, 2021 @ 1:50 p.m. N. Jovee sent an email to the County of Snohomish Executive explaining what was happening with GAL Dr. Meera Shin and the County of Snohomish Superior Court in an attempt to seek relief and file a GAL complaint. The County of Snohomish Executive did not respond.

56. On March 24th, 2021 Defendant GAL Dr. Meera Shin filed a Motion to Seal COST BILL UPDATED on 3 12 21, REPLY to Nathan's Response to Motion for an Additional GAL fee, and REPLY to Nathan's Response to Motion for Legal Messenger.

57. On April 2nd, 2021 Defendant GAL Dr. Meera Shin submitted a Fourth (4th) Motion for Additional GAL Fees or Dismiss GAL.



1 58. On June 8th, 2021 the Bryan County District Court of Oklahoma re-entered the Remanded  
2 Custody Determination in accordance with RCW 26.27 and declaring "Home State" over N.  
3 Jovee, J. Jovee, and their three (3) said minor children in accordance with the UCCJEA.  
4 Oklahoma maintained Jurisdiction for all purposes and in accordance with RCW 26.27; the  
5 UCCJEA.  
6

7 59. On July 13th, 2021 @ 10:52 a.m. N. Jovee sent an email to the County of Snohomish  
8 Executive explaining what was happening with GAL Dr. Meera Shin and the County of  
9 Snohomish Superior Court in an attempt to seek relief. The County of Snohomish Executive  
10 did not respond.  
11

12 60. On or about July, 2021 N. Jovee personally served County of Snohomish employee Joseph  
13 Genster. During this process service of Mr. Genster, he made derogatory remarks about my  
14 lower back disability and laughed. This was all caught on video as seen on YouTube.  
15

16 61. On September 9th, September 23rd, and October 6th, 2021 the County of Snohomish  
17 Superior Court entered Orders "enforcing" Jurisdiction, without the Court having Subject  
18 Matter Jurisdiction, over the three (3) said Minor Children in this case at the same time as  
19 Oklahoma. The County of Snohomish Superior Court did not exercise "Emergency  
20 Jurisdiction" over any of the parties in accordance with RCW 26.27.  
21

22 62. On October 8th, 2021 N. Jovee's Custody Determination from the State of Oklahoma was  
23 entered into the County of Snohomish Superior Court and "confirmed" in accordance with  
24 RCW 26.27; the UCCJEA.

25 63. On October 22nd, 2021 the County of Snohomish Superior Court entered Orders "enforcing"  
26 Jurisdiction and "modifying" N. Jovee's Oklahoma Custody Determination, without the  
27 Court having Subject Matter Jurisdiction, over the three (3) said Minor Children in this case  
28

1 at the same time as the State of Oklahoma. The County of Snohomish Superior Court did  
2 not exercise "Emergency Jurisdiction" over any of the parties in accordance with RCW 26.27.  
3

4  
5 **First Cause of Action**  
6 **(Negligence against Defendants)**

7 64. N. Jovee repeats and incorporates herein by reference the allegations of paragraphs 1 through  
8 63, as set forth below at length.

9 65. The above-described actions by Defendants County of Snohomish, L.M.E., INC and GAL  
10 Dr. Meera Shin; as well as, the above-described actions causing bodily-harm injury and/or  
11 exacerbating current injuries and assault by Defendant Jim Simoneschi and by proxy,  
12 Defendant County of Snohomish Sheriff was directly and proximately caused by the  
13 negligence, negligent legal malpractice, negligent entrustment, negligent misrepresentation  
14 and/or gross negligence, and the willful and wonton or reckless conduct of the above-named  
15 Defendants, whose actions were in violation of, not limited to the following statutes and  
16 Washington State Court Rules: RCW 9A.36; RCW 19.86, RCW 26.12, RCW 26.27, RCW  
17 26.44, Washington State Court Rules: Superior Court Guardian ad Litem Rules and the  
18 Americans with Disabilities Act.  
19

20  
21 66. Because of his injuries, N. Jovee was and has been required to seek medical treatment for his  
22 injuries, which result/ed in medical expenses and costs.  
23

24  
25 **Second Cause of Action**  
26 **(Intentional Infliction of Emotional Distress)**

27 67. N. Jovee repeats and incorporates herein by reference the allegations of paragraphs 1 through  
28 66, as set forth below at length.



1 68. The tort for intentional infliction of emotional distress has four (4) elements: (1) the  
2 Defendant must act intentionally or recklessly; (2) the Defendant's conduct must be extreme  
3 and outrageous; and (3) the conduct must be the cause; (4) of severe emotional distress.  
4

5 69. In this case Defendant's, and each of them, acted intentionally and recklessly when they acted  
6 together in collusion, refusing to intervene and/or alert proper authorities as required under  
7 ethics laws/rules, provided false testimony, admitted they gave false testimony, had  
8 knowledge of the false testimony and encouraged the parties to continue litigation without  
9 correcting the false testimony, made derogatory remarks to N. Jovee in an attempt to provoke  
10 N. Jovee into violence, attempting to force N. Jovee to be "mentally evaluated" with no  
11 causation and failure to prevent GAL Dr. Meera Shin from recommending "suspension" of  
12 N. Jovee's Oklahoma Court Ordered visitation with his three (3) minor boys.  
13

14 70. In this case Defendant's, and each of them, conduct was extreme and outrageous as they  
15 attempted to collude to alienate N. Jovee's minor children from their Father, violate Court  
16 Ordered Visitation, allowing and entering N. Jovee's Social Security Number into the Public  
17 Court Record, covering-up prior violations of Washington State Superior Court GAL Rule  
18 violations, failing to disclose conflicts-of-interest and assaulting N. Jovee in an attempt to get  
19 a reaction and provocation of violence were extreme and outrageous.  
20

21 71. The conduct of Defendant's, and each of them, was the cause of and/or exacerbated N.  
22 Jovee's anxiety, post-traumatic stress, emotional distress, lower spine injury, hip injuries  
23 and/or pain and suffering from extreme pressure being applied to N. Jovee's two (2) herniated  
24 discs located in his lower spine.  
25

26 72. N. Jovee was, is and/or the actions of the Defendants have exacerbated N. Jovee's anxiety  
27 and/or post-traumatic stress as a result of the Defendants actions of attempting to alienate the  
28



Jovee minor children from their Father. N. Jovee was, is and/or the actions of the Defendants have exacerbated N. Jovee's anxiety and/or post-traumatic stress as a result of the Defendants actions of applying extreme pressure to my lower spine. N. Jovee was and is still suffering from pain and suffering due to extreme pressure being applied to N. Jovee's two (2) herniated discs located in his lower spine by Defendant Jim Simoneschi. N. Jovee has been required to seek medical treatment for his injuries, which result/ed in expenses and costs.

73. As a direct and proximate result of Defendant's negligence, N. Jovee has been damaged in a sum within the Jurisdiction of this Court and in an amount according to proof, including but not limited to general and special damages, anxiety and/or post-traumatic stress disorder and/or exacerbating N. Jovee's anxiety and/or post-traumatic stress disorder, medical expenses, loss of wages, loss of consortium, and pain and suffering, and such other ordinary and reasonable expenses due to the actions of the Defendants. N. Jovee will seek leave of the Court to Amend this Complaint to allege the exact amount of said damages when said sum is fully ascertained.

74. If Defendant/s shall allege there is a party or non-party at fault (CR 12(I)), and Defendant/s are successful in sustaining their burden of proof against said potential other non-parties, and the tier of facts finds that any non-party or party as may be hereafter brought into this action is at fault, then N. Jovee shall also be entitled to a Judgement against said other parties or non-parties against whom Defendant/s have prevailed (CR 8).

**Third Cause of Action  
(Washington State Consumer Protection Act)**

75. N. Jovee repeats and incorporates herein by reference the allegations of paragraphs 1 through 74, as set forth below at length.

1 76. A Plaintiff may file and enjoin a claim for damages for any and all violations of **RCW**  
2 **19.86.020, 19.86.030, 19.86.040, 19.86.050, or 19.86.060** in Superior Court under **RCW**  
3 **19.86.090**.

4  
5 77. To have a claim under the Washington State Consumer Protection Act alleged under **RCW**  
6 **19.86.020**, the Plaintiff must satisfy element one (1) and two (2) or three (3), the third element  
7 having three (3) sub-elements (a - c); in a private action to which an unfair or deceptive act  
8 or practice is injurious to the public interest; as specified under **RCW 19.86.093**, because it:  
9 (1) violates a statute that is incorporated under **RCW 19.86**; (2) violates a statute that contains  
10 a specific legislative declaration of public interest impact; or (3)(a) injured other persons; (b)  
11 had the capacity to injure other persons; or (c) has the capacity to injure other persons.  
12

13 78. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and the County of  
14 Snohomish have violated **RCW 19.86.030**. Every contract, combination, in the form of trust  
15 or otherwise, or conspiracy in restraint of trade or commerce is declared unlawful. See **RCW**  
16 **19.86.030**. Defendant/s L.M.E., INC was contracted with the County of Snohomish for Legal  
17 Services at the same time GAL Dr. Meera Shin was contracted with the County of Snohomish  
18 for GAL Services under Title 26; RCW. L.M.E., INC was making Legal recommendations  
19 and/or giving legal advice to the County of Snohomish directly relating to N. Jovee's GAL  
20 Complaints upon County of Snohomish contracted GAL Dr. Meera Shin. GAL Dr. Meera  
21 Shin was getting legal advice from the County of Snohomish employees. Defendant/s L.M.E.,  
22 INC and GAL-Dr. Meera Shin have both been monetary compensated for their actions by the  
23 County of Snohomish. Under **RCW 19.86.030**, contracts and/or a combination of contracts  
24 cannot conspire "in restraint of trade or commerce"; as N. Jovee asserts has happened in this  
25 case. Under the above set-forth elements for violation of the Washington State Consumer  
26  
27  
28



1 Protection Act; N. Jovee asserts the above related actions in violation of **RCW 19.86.030** can  
2 also be compensated under **RCW 19.86.020**; as long as it meets the criterion set forth above,  
3 as: (1) N. Jovee asserts violation of **RCW 19.86.030** meets the requirement set forth in  
4 element (1); (2) N. Jovee asserts this violation also conforms to element (2) as the UCCJEA,  
5 **RCW 26.27** and **RCW 26.12** contains specific legislative declarations of public interest  
6 impact; and (3) N. Jovee asserts as a result of the above alleged actions, criterion set forth  
7 under element (3) have been met as Defendant/s (a) have injured other persons, specifically  
8 Ms. Christie Cano; or (b) had the capacity to injure other persons; or (c) still has the capacity  
9 to injure other persons as the Defendant L.M.E., INC is an active business entity and GAL  
10 Dr. Meera Shin is, to N. Jovee's best knowledge and belief, an active GAL in the State of  
11 Washington.  
12

13  
14 79. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and the County of  
15 Snohomish have violated **RCW 19.86.040**. It shall be unlawful for any person to monopolize,  
16 or attempt to monopolize or combine or conspire with any other person or persons to  
17 monopolize any part of trade or commerce. See **RCW 19.86.040**. Defendant L.M.E., INC  
18 was/is contracted with the County of Snohomish for Legal Services. L.M.E., INC was  
19 making Legal recommendations and/or giving legal advice to the County of Snohomish  
20 directly relating to N. Jovee's GAL Complaints upon County of Snohomish contracted GAL  
21 Dr. Meera Shin. Upon completion of N. Jovee's 2nd GAL Complaint, Defendant County of  
22 Snohomish "acquired" L.M.E., INC's Registered and Governing Agent to become a County  
23 of Snohomish Superior Court Commissioner to sit and hear Motions regarding the same  
24 "GAL Complaints" submitted by N. Jovee. Under **RCW 19.86.040**, no person can  
25 monopolize, or "attempt to monopolize" or combine or conspire with any other person or  
26  
27  
28



1 persons to monopolize any part of trade or commerce; as N. Jovee asserts has happened in  
2 this case. Under the above set-forth elements for violation of the Washington State Consumer  
3 Protection Act; N. Jovee asserts the above related actions in violation of **RCW 19.86.040** can  
4 also be compensated under **RCW 19.86.020**; as long as it meets the criterion set forth above,  
5 as: (1) N. Jovee asserts violation of **RCW 19.86.040** meets the requirement set forth in  
6 element (1); (2) N. Jovee asserts this violation also conforms to element (2) as the UCCJEA,  
7 **RCW 26.27**, **RCW 26.12**, Washington State Doctor and Attorney ethics laws containing  
8 specific legislative declarations of public interest impact; and/or (3) N. Jovee asserts as a  
9 result of the above alleged actions, criterion set forth under element (3) have been met as  
10 Defendant/s (a) have injured other persons, specifically N. Jovee's minor children and other  
11 minor children of the public; or (b) had the capacity to injure other persons, specifically N.  
12 Jovee's minor children and other minor children of the public; or (c) still has the capacity to  
13 injure other persons, specifically N. Jovee's minor children and other minor children of the  
14 public as the Defendant L.M.E., INC is an active business entity and GAL Dr. Meera Shin is,  
15 to N. Jovee's best knowledge and belief, an active GAL in the State of Washington.

19 80. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and/or the County of  
20 Snohomish have violated **RCW 19.86.060**. It shall be unlawful for any corporation to acquire,  
21 directly or indirectly, the whole or any part of the stock or assets of another corporation where  
22 the effect of such acquisition may be to substantially lessen competition or tend to create a  
23 monopoly in any line of commerce. See **RCW 19.86.060**. Defendant L.M.E., INC was/is  
24 contracted with the County of Snohomish for Legal Services. L.M.E., INC was making Legal  
25 recommendations and/or giving legal advice to the County of Snohomish directly relating to  
26 N. Jovee's GAL Complaints upon County of Snohomish contracted GAL Dr. Meera Shin.  
27  
28

1 Upon completion of N. Jovee's 2nd GAL Complaint, Defendant County of Snohomish  
2 "acquired" L.M.E., INC by appointing its Registered and Governing Agent to become a  
3 County of Snohomish Superior Court Commissioner to sit and hear Motions regarding the  
4 same "GAL Complaints" submitted by N. Jovee. Under **RCW 19.86.060**, no corporation  
5 can acquire, directly or indirectly, the whole or any part of the stock or assets of another  
6 corporation where the effect of such acquisition may be to substantially lessen competition  
7 or "tend to create a monopoly in any line of commerce"; as N. Jovee asserts has happened in  
8 this case. Under the above set-forth elements for violation of the Washington State Consumer  
9 Protection Act; N. Jovee asserts the above related actions in violation of **RCW 19.86.060** can  
10 also be compensated under **RCW 19.86.020**; as long as it meets the criterion set forth above,  
11 as: (1) N. Jovee asserts violation of **RCW 19.86.060** meets the requirement set forth in  
12 element (1); (2) N. Jovee asserts this violation also conforms to element (2) as the Washington  
13 State Constitution, the UCCJEA, **RCW 26.27**, **RCW 26.12**, Washington State Doctor and  
14 Attorney ethics laws containing specific legislative declarations of public interest impact;  
15 and/or (3) N. Jovee asserts as a result of the above alleged actions, criterion set forth under  
16 element (3) have been met as Defendant/s (a) have injured other persons, specifically N.  
17 Jovee's minor children and other minor children of the public; or (b) had the capacity to injure  
18 other persons, specifically N. Jovee's minor children and other minor children and members  
19 of the public; or (c) still has the capacity to injure other persons, specifically N. Jovee's minor  
20 children and other minor children and members of the public as the Defendant L.M.E., INC  
21 is an active business entity and GAL Dr. Meera Shin is, to N. Jovee's best knowledge and  
22 belief, an active GAL in the State of Washington.  
23  
24  
25  
26  
27  
28



1 81. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and/or the County of  
2 Snohomish have violated **RCW 19.86.020** on each date a hearing was held in front of L.M.E.,  
3 INC involving GAL Dr. Meera Shin's GAL violations.

4  
5 82. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and/or the County of  
6 Snohomish have violated **RCW 19.86.020** on each occasion GAL Dr. Meera Shin filed a  
7 fraudulent and/or false statement into and/or on the Official Court Record.

8  
9 83. N. Jovee claims Defendant/s L.M.E., INC, GAL Dr. Meera Shin and/or the County of  
10 Snohomish have violated **RCW 19.86.020** on each occasion L.M.E., INC filed a fraudulent  
11 and/or false statement into and/or on the Official Court Record.

12 84. Defendant/s GAL Dr. Meera Shin and L.M.E., INC both maintained contracts with the  
13 County of Snohomish; which all have a "duty to the public" in their official capacity as a  
14 GAL, Doctor and/or as an Attorney at Law. Further, N. Jovee asserts Defendant/s GAL Dr.  
15 Meera Shin and L.M.E., INC both had a further duty to N. Jovee and the three (3) minor  
16 Jovee boys when reviewing misconduct and/or abuse claims directly relating to the minor  
17 Jovee children.

18  
19 85. As prescribed under **RCW 19.86.140**, Civil Penalties are also awarded for violations of  
20 **RCW 19.86.020**, **RCW 19.86.030** and/or **RCW 19.86.040**.

21  
22 86. N. Jovee requests a penalty for each individual Defendant, found liable, who violated **RCW**  
23 **19.86.030** and/or **RCW 19.86.040** of not more than \$180,000.00. For every Defendant, other  
24 than an individual who violated **RCW 19.86.030** and/or **RCW 19.86.040**, N. Jovee requests  
25 a penalty of not more than \$900,000.00.

26  
27 87. N. Jovee requests an "enhanced penalty of \$5,000" as prescribed under **RCW 19.86.140** for  
28 the Defendants actions of "targeting" N. Jovee; a "physically disabled veteran".



**Prayer for Relief**

88. WHEREFORE, N. Jovee prays as follows:

- 1) For an award of damages compensating N. Jovee in an amount to be proven at trial;
- 2) For an award of civil penalties in an amount to be proven at trial and/or prescribed under **RCW 19.86.140**;
- 3) For an award of costs compensating N. Jovee for his costs of suit incurred herein;
- 4) For an award of fees under RCW 4.84 or as otherwise permitted by law; and
- 5) Any other relief requested in this Complaint and/or such other relief as the Court may find just and proper.

**Reservation of Rights**


89. N. Jovee reserves the right to amend his complaint further and conduct discovery relevant to this suit.

**Jury Trial Demanded**

90. N. Jovee seeks a 12 - person Jury Trial on all matters; pursuant to CR 38 and the Washington State's Constitution.

DATED this 24th day of January 2022 at Everett, Washington.

Respectfully submitted,

  
Nathan Jovee, Pro Se litigant;  
Honorably Discharged Disabled  
Iraqi War Veteran

# Exhibit 1

**Snohomish County****CLAIM FOR DAMAGE FORM**

For Official Use Only

Snohomish County Auditor

Pursuant to Chapter 4.96 RCW, this form is for filing a tort claim against Snohomish County. Some of the information requested on this form is required by RCW 4.96.020. The contents of this form and all attached materials may be subject to public disclosure.

MAY 10 '21 PM 12:27

**PLEASE TYPE OR PRINT IN INK.**

Mail or deliver original claim to: **Snohomish County Risk Manager**  
 3000 Rockefeller Avenue, M/S 610  
 Everett, WA 98201-4046

**Hours:** Monday – Friday, 8:00 a.m. to 5:00 p.m.  
 (Excluding Weekends and Holidays)

**CLAIMANT INFORMATION**

- (1) Claimant's name: Jovee, Nathan E. 06/20/1986  
(Last Name) (First Name) (MI) Date of Birth (MM/DD/YYYY)
- (2) Current residential address: 10115 Holly Dr. Apt. Q301, Everett, WA 98201
- (3) Mailing address (if different): Same
- (4) Residential address on the date of the incident (if different from current address):  
 \_\_\_\_\_  
 \_\_\_\_\_
- (5) Claimant's daytime phone numbers: Home Phone # \_\_\_\_\_  
 Business or Cell # 425-530-7435  
 E-mail address: njovee@gmail.com
- (6) Are you represented by an attorney for this claim? ☒ NO ☐ YES (If yes, please provide the following information.)  
 Name of Attorney: \_\_\_\_\_  
 Address of Attorney: \_\_\_\_\_  
 \_\_\_\_\_  
 Phone number of Attorney: \_\_\_\_\_





(13) Please attach documents to support your claim. (Pictures, Bids, Invoices etc.)

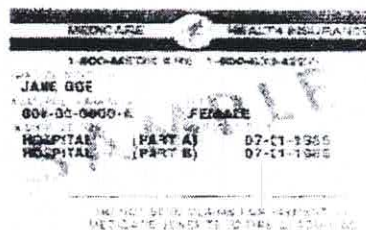
- (14) (a) If your claim includes damages for personal injury, bodily injury, or for any costs associated with medically treating personal or bodily injuries, please provide the information requested below. The federal government has established certain reporting requirements relating to claims for personal and bodily injuries, which Snohomish County is obligated to follow whether your claim is denied, results in a settlement from the County or a judgment in your favor.

*Please note that many Medicare beneficiaries have other insurance in addition to their Medicare benefits. Sometimes, Medicare is supposed to pay after the other insurance. However, if there is a delay, Medicare may make a "conditional payment" so as not to inconvenience the beneficiary and recover after the other other insurance pays.*

*Section 111 of the Medicare, Medicaid and SCHIP Extension Act of 2007 (MMSEA), a federal law that became effective January 1, 2009, requires that liability insurers (including self-insurers), no fault insurers, and workers' compensation plans report specific information about Medicare beneficiaries who have other insurance coverage. This reporting is to assist the Centers for Medicare and Medicaid Services and other insurance plans to properly coordinate payment of benefits among plans so that your claims are paid promptly and correctly.*

We are asking you to answer the questions below so that we may comply with this law.

Please review this example of a Medicare card to determine if you have, or have ever had, a similar Medicare card.



- (b) Are you presently, or have you ever been enrolled in Medicare? Yes \_\_\_\_\_ No<sup>x</sup> \_\_\_\_\_  
If Yes, please also provide the following:

Full Name as it appears on your SSN or Medicare Card if available: \_\_\_\_\_

Date of Birth: \_\_\_\_\_

Medicare Number (or SSN\* if Medicare Number unavailable): \_\_\_\_\_

Sex: Male \_\_\_\_\_ Female \_\_\_\_\_

- (c) If you are refusing to provide the information requested immediately above, then please provide the reason(s) for refusal to provide requested information:

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I understand that if I am a Medicare beneficiary and I do not provide the requested information, I may be violating obligations as a beneficiary to assist Medicare in coordinating benefits to pay my claims correctly and promptly.

Signature

05/06/2021

Date

- (15) Names, addresses and telephone numbers of all persons involved in or witness to this incident:

County of Snohomish GAL Committee - Information on file-----

County of Snohomish GAL Sub-Committee - Information on file-----

County of Snohomish Commissioners - Information on file-----

Meera Shin - Information on file-----

Christine Liesback - Information on file-----

Andrew Somers - Information on file----- N. Jovee reserves the Right to Add witnesses.--

- (16) Names of all Snohomish County employees having knowledge of this incident:

See above.-----

- (17) Names, addresses, and telephone numbers of all individuals not already identified in (13) and (14) above that have knowledge regarding the liability issues involved in this incident, or knowledge of the claimant's resulting damages. Please include a brief description as to the nature and extent of each person's knowledge. Attach additional sheets if necessary.

Alex Witenberg - Witnessed Meera Shin's ADMITTALS during her Deposition; -----

Dave Somers - I sent an email to Mr. Dave informing him of the situation; -----

Nancy Norris; most of the Snohomish County Superior Court and its Employees.-----

George Appel - Involved in the violations of N. Jovee's Rights via communications.-----

- (18) Has this incident been reported to law enforcement, safety or security personnel? If so, when and to whom? Attach a copy of any reports. (Please note that all attachments may be subject to public disclosure.)

Yes; Reported to FBI, DOJ, CJC, Medical Board. TBD at trial-----



- (19) Names, addresses and telephone numbers of treating medical providers. Attach copies of all medical reports and billings. (Please note that all attachments may be subject to public disclosure.)

TBD at trial

**\*\*ADDITIONAL INFORMATION REQUIRED FOR AUTOMOBILE CLAIMS ONLY\*\***

License Plate#:	_____			Driver License#:	_____		
Type of Auto:	_____	_____	_____	_____	_____	_____	_____
	(Year)	(Make)		(Model)			
DRIVER:	_____			OWNER:	_____		
Address:	_____			Address:	_____		
	_____				_____		
	_____				_____		

This claim form must be signed by the Claimant, a person holding a written Power of Attorney from the Claimant, the Attorney in Fact for the Claimant, an Attorney admitted to practice in the State of Washington on the Claimant's behalf or by a Court-Approved Guardian or Guardian Ad Litem on behalf of the Claimant.

**NOTE: THIS FORM MUST BE SIGNED**

I, the undersigned, declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

X \_\_\_\_\_  
Signature of Claimant

Date: 05/06/2021

X Nathan Jovee  
Printed Name

X \_\_\_\_\_  
Signature of Claimant

Date: \_\_\_\_\_

X \_\_\_\_\_  
Printed Name

(Add additional signature blocks as necessary)

# CLAIM FOR DAMAGE FORM

Page 1 of 5



**INCIDENT INFORMATION**

- (7) Date of incident: \_\_\_\_\_ Time: \_\_\_\_\_ ☐ A.M. ☐ P.M.  
(MM/DD/YYYY) (Check one)
- (8) If the incident occurred over a period of time, date of first and last occurrences:
- From: 04/10/2020 Time: 3:04 ☐ A.M. ☒ P.M.  
(MM/DD/YYYY) (Check one)
- To: Present Day Time: \_\_\_\_\_ ☐ A.M. ☐ P.M.  
(MM/DD/YYYY) (Check one)
- (9) Location of incident: Outside the Snohomish County Drewel Building; County of Snohomish  
Place where incident occurred (City, if applicable)
- (10) If the incident occurred on a street or highway:
- \_\_\_\_\_  
(Name of Street/Highway) (Intersection or nearest intersecting Street)
- (11) Describe what happened. Please provide a description of the conduct and the circumstances that brought about the injury or damage. Please provide a description of the injury or damage. Explain the extent of property loss or medical, physical or mental injuries. (Attach additional sheets if necessary.)
- The County of Snohomish employee Joe Genster made derogatory and badgering  
comments about Nathan Jovee's ADA protected, lower back disability recieved while  
serving on Active Duty in the U.S. Armed forces. These comments were directed directly  
at Nathan Jovee while he was attempting to execute "Official Court Service" of a Subpoena  
and was done in order to intentionally inflict emotional distress upon Nathan Jovee.  
Joe Genster has personal knowledge of my lower back injury due to the Snohomish County  
Sheriffs officer Jim Semonasski intentionally placing his knuckles in my lower back  
that has three (3) herniated Disks. The actions of Joe Genster were calculated and  
meant to harrass and badger Nathan Jovee as he was attempting to execute Official Court  
business. Joe Genster is a Publicly paid County worker with expectations far greater  
than that of what he displayed while in public.
- \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- (12) I claim damages in the amount of \$ \$25,000.00

Continue on reverse side...



(13) Please attach documents to support your claim. (Pictures, Bids, Invoices etc.)

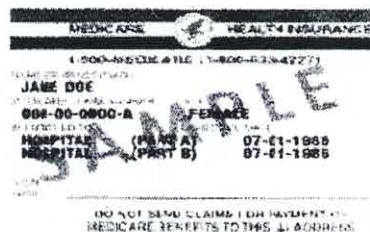
- (14) (a) If your claim includes damages for personal injury, bodily injury, or for any costs associated with medically treating personal or bodily injuries, please provide the information requested below. The federal government has established certain reporting requirements relating to claims for personal and bodily injuries, which Snohomish County is obligated to follow whether your claim is denied, results in a settlement from the County or a judgment in your favor.

*Please note that many Medicare beneficiaries have other insurance in addition to their Medicare benefits. Sometimes, Medicare is supposed to pay after the other insurance. However, if there is a delay, Medicare may make a "conditional payment" so as not to inconvenience the beneficiary and recover after the other insurance pays.*

*Section 111 of the Medicare, Medicaid and SCHIP Extension Act of 2007 (MMSEA), a federal law that became effective January 1, 2009, requires that liability insurers (including self-insurers), no fault insurers, and workers' compensation plans report specific information about Medicare beneficiaries who have other insurance coverage. This reporting is to assist the Centers for Medicare and Medicaid Services and other insurance plans to properly coordinate payment of benefits among plans so that your claims are paid promptly and correctly.*

We are asking you to answer the questions below so that we may comply with this law.

Please review this example of a Medicare card to determine if you have, or have ever had, a similar Medicare card.



- (b) Are you presently, or have you ever been enrolled in Medicare? Yes \_\_\_\_\_ No <sup>x</sup> \_\_\_\_\_  
If Yes, please also provide the following:

Full Name as it appears on your SSN or Medicare Card if available: \_\_\_\_\_  
Date of Birth: \_\_\_\_\_  
Medicare Number (or SSN\* if Medicare Number unavailable): \_\_\_\_\_  
Sex: Male \_\_\_\_\_ Female \_\_\_\_\_

- (c) If you are refusing to provide the information requested immediately above, then please provide the reason(s) for refusal to provide requested information:

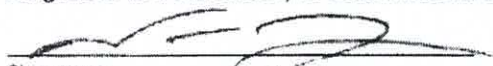
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I understand that if I am a Medicare beneficiary and I do not provide the requested information, I may be violating obligations as a beneficiary to assist Medicare in coordinating benefits to pay my claims correctly and promptly.

  
Signature

05/06/2021

Date

- (15) Names, addresses and telephone numbers of all persons involved in or witness to this incident:

County of Snohomish worker/witness - Geoff -----

County of Snohomish worker/witness - Joe Genster-----

Lori Shavlik ----- N. Jovee reserves the Right to Add witnesses.--

- (16) Names of all Snohomish County employees having knowledge of this incident:

See above.-----

- (17) Names, addresses, and telephone numbers of all individuals not already identified in (13) and (14) above that have knowledge regarding the liability issues involved in this incident, or knowledge of the claimant's resulting damages. Please include a brief description as to the nature and extent of each person's knowledge. Attach additional sheets if necessary.

- (18) Has this incident been reported to law enforcement, safety or security personnel? If so, when and to whom? Attach a copy of any reports. (Please note that all attachments may be subject to public disclosure.)

Yes; Reported to WA State BAR. TBD at trial-----



- (19) Names, addresses and telephone numbers of treating medical providers. Attach copies of all medical reports and billings. (Please note that all attachments may be subject to public disclosure.)

TBD at trial

**\*\*ADDITIONAL INFORMATION REQUIRED FOR AUTOMOBILE CLAIMS ONLY\*\***

License Plate #: \_\_\_\_\_ Driver License #: \_\_\_\_\_

Type of Auto: \_\_\_\_\_ (Year) \_\_\_\_\_ (Make) \_\_\_\_\_ (Model)

DRIVER: \_\_\_\_\_ OWNER: \_\_\_\_\_

Address: \_\_\_\_\_ Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

This claim form must be signed by the Claimant, a person holding a written Power of Attorney from the Claimant, the Attorney in Fact for the Claimant, an Attorney admitted to practice in the State of Washington on the Claimant's behalf or by a Court-Approved Guardian or Guardian Ad Litem on behalf of the Claimant.

**NOTE: THIS FORM MUST BE SIGNED**

I, the undersigned, declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

X

Signature of Claimant

Date: 08/13/2021

X

Nathan Jovee

Printed Name

X

Signature of Claimant

Date: \_\_\_\_\_

X

Printed Name

(Add additional signature blocks as necessary)